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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MICHAEL W. DOBBING CLERK: U.S. DISTRICT COURT

UNITED STATES OF AMERICA)	·	- COULT
v.)	$_{\scriptscriptstyle \rm N}$ O $8{\rm CR}$	531
LORENZO F. INGRAM, aka "D," aka "Trump,"		001
MARTEL O. JACKSON, aka "O'Shea,"	Magistrate Judge Jeffrey Cole	
aka "Cheetah,"		
ANTOINE JACKSON, aka "Red,"		
CRYSTAL R. JACKSON, and		
CHRISTOPHER A. MOSBY, aka "BO"		

GOVERNMENT'S EX PARTE MOTION TO SEAL COMPLAINT, AFFIDAVIT, AND ARREST WARRANTS

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal the Complaint, Affidavit, and Arrest Warrants:

The public filing of the Complaint, Affidavit, and Arrest Warrants in this matter before the Arrest Warrant can be executed could alert the defendant and other subjects, which in turn could lead to flight to avoid prosecution by co-conspirators or the destruction of or tampering with evidence.

WHEREFORE, the United States respectfully requests this Court to enter an Order placing the Complaint, Affidavit, and Arrest Warrants, as well as this Motion and Order to Seal, until arrest of any defendant named above or until further order of this Court, except that copies of the arrest warrants shall be provided to law enforcement in order to execute the arrest of the defendants.

Respectfully submitted,

PATRICK J. FITZGERALD United States Attorney

By:

LELA D. JOHNSON

Assistant United States Attorney 219 South Dearborn Street

Chicago, Illinois 60604

(312) 353-4320

DATE: July 8, 2008